

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. CR 15-4268-18 JB
	)	
vs.	)	
	)	
ANGEL DELEON, et al.,	)	
	)	
Defendants.	)	
	)	

**UNITED STATES' UNOPPOSED MOTION TO EXCEED THE 27-PAGE LIMIT**  
**FOR ITS MOTION TO RECONSIDER THE**  
**COURT'S ORDER FOR LIMITED PRODUCTION OF SENSITIVE**  
**GOVERNMENT RECORDING DEVICES OR PROGRAMS**

The United States of America moves the Court to extend the 27-page limit for its Motion to Reconsider the Court's Order for Limited Production of Sensitive Government Recording Devices or Programs (Doc. 1551). The United States, under D.N.M.LR-Cr. 47.1, contacted opposing counsel in this case and they do not oppose.<sup>1</sup>

The United States requests the Court's leave to file its response in excess of the 27-page limit, because of the complexity of the issue, and to provide the Court with sufficient factual background to analyze the Defendants' request for production of the ELSUR device.

**WHEREFORE**, for the foregoing reasons, the United States of America respectfully requests that this Court grant the United States' unopposed motion for the Court's leave to file its Motion to Reconsider in excess of the 27-page limit set by Local Criminal Rules.

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<sup>1</sup> The United States sent an email asking all counsel to respond with opposition by 3:30 pm, on December 6, 2017, or the United States would assume there was no opposition. Counsel either responded that they did not oppose, or did not respond.

Respectfully Submitted,

JAMES D. TIERNEY  
Acting United States Attorney

**Electronically filed on 12/6/17**

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I HEREBY CERTIFY that I electronically  
filed the foregoing with the Clerk of the  
Court using the CM/ECF system which  
will send electronic notification to defense  
counsel of record on this date.

/s/\_\_\_\_\_  
MATTHEW M. BECK  
Assistant United States Attorney